

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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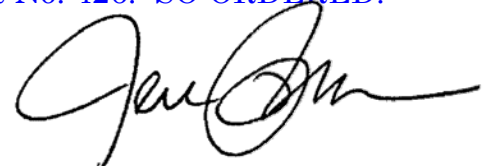
March 18, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Applications DENIED, except that sentencing is
RESCHEDULED to June 2, 2022, at 10 a.m.
Defense submissions in connection with sentencing
are due two weeks prior to the sentencing date; the
Government's submissions are due one week before
the sentencing date. The Clerk of Court is directed
to terminate Docket No. 426. SO ORDERED.

RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)



March 21, 2022

Dear Judge Furman:

The defense respectfully seeks a 60-day adjournment of the sentencing proceeding in the above-captioned case and requests that the Court sentence Mr. Avenatti via videoconference. The Government objects to an adjournment, but does not object to a remote sentencing hearing.

A 60-day adjournment is necessary to afford the defense adequate time to prepare and obtain mitigation related to loss-amount arguments under Application Note 3(E)(i) to U.S.S.G. § 2B1.1 and 18 U.S.C. § 3553(a). The defense also anticipates pursuing variance-related arguments under 18 U.S.C. § 3553(a)(2)(D) and requires additional time to obtain relevant records and data.

Respectfully Submitted,

/s/
Robert M. Baum, Esq.
Andrew J. Dalack, Esq.
Tamara L. Giwa, Esq.
Assistant Federal Defenders

Cc: Government Counsel

Counsel for Michael Avenatti